

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

T.G.,

Plaintiff,

vs.

Cause No. 1:19-cv-1116 JFR/JHR

BOARD OF COUNTY COMMISSIONERS  
OF COUNTY OF RIO ARRIBA, RIO ARRIBA  
COUNTY SHERIFF JAMES LUJAN and  
RIO ARRIBA COUNTY SHERIFF'S DEPUTY  
LEON GALLEGOS,

Defendants.

**INITIAL DISCLOSURES OF DEFENDANT LEON GALLEGOS**

COMES NOW Defendant, Leon Gallegos, by and through his counsel of record, YLAW,  
P.C. (Robert W. Becker, appearing), and make the following initial disclosures pursuant to  
Federal Rule of Civil Procedure 26.

**1. The name, address and telephone number of each individual likely to have  
discoverable information – along with the subjects of that information – that Defendant  
may use to support their defenses, unless the use would be solely for impeachment.**

- a. Leon Gallegos (Rio Arriba County)  
c/o Robert W. Becker, Esq.  
4908 Alameda Blvd., NE  
Albuquerque, NM 87113  
(505) 266-3995

Deputy Gallegos will testify to issuance of the X-2 taser to him and his actions during the  
incident.

- b. T.G. (Rio Arriba County)  
c/o Shannon L. Kennedy, Attorney at Law  
Kennedy, Kennedy & Ives, P.C.  
1100 2<sup>nd</sup> Street, NW  
Albuquerque, NM 87102  
(505) 244-1400

T.G. will testify to his actions during the incident.

- c. Isaiah Anaya (Espanola)  
Espanola Police Department  
1316 Calle Adelante  
Espanola, NM 87532  
(505) 747-6002

Officer Anaya was a Rio Arriba County Sheriff's Officer on the date of the incident. He will testify to what he observed.

- d. Ronald Campos (Rio Arriba County)  
Rio Arriba County Sheriff's Department  
1122 Industrial Park road  
Espanola, NM 87532  
(505) 753-3329

Transport Officer Campos will testify to comments he overheard T.G. make after the incident.

- e. Joseph Cannon (Rio Arriba County)  
1122 Industrial Park road  
Espanola, NM 87532  
(505) 753-3329

Deputy Cannon will testify to his arrest of T.G. prior to the incident.

**2. A description by category and location – of all documents, electronically stored information and tangible things – that Defendants have in their possession, custody or control and may use to support their defenses unless the use would be solely for impeachment.**

- a. X-2 Taser
- b. MP-26 Taser

- c. Report/Memorandum of Deputy Leon Gallegos dated June 3, 2019
- d. Charges filed against T.G. prior to incident by Deputy Joseph

Cannon

- e. Medical records on T.G.
- f. Rio Arriba County Sheriff's Office relevant Policies and Procedures

Copies of these documents are in the possession of defense counsel with the exception of the tasers, which remain in the custody of the Rio Arriba County Sheriff's Office and its deputies.

**3. A copy of the insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Leon Gallegos is insured pursuant to the provisions of the New Mexico Tort Claims Act and a policy of insurance issued by OneBeacon American Insurance Company. The insuring agreement from OneBeacon has already been provided to Plaintiff's counsel in the case of B.L. on behalf on A.M. v. Board of County Commissioners of County of Rio Arriba, First Judicial District Court, Rio Arriba County, Case No. D-117-CV-2019-00262.

Respectfully submitted,

YLAW, P.C.

**/s/ Robert W. Becker**

Robert W. Becker

*Attorney for Defendant Leon Gallegos*

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Albuquerque, NM 87113-1736

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[rbecker@ylawfirm.com](mailto:rbecker@ylawfirm.com)

**I HEREBY CERTIFY** that on the 29<sup>th</sup> day of January, 2020, I filed the foregoing electronically through the CM/ECF filing system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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Commissioners of County of Rio Arriba  
and James Lujan***

***/s/ Robert W. Becker***

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